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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITES 30, 32, AND 33 RECORD  
OF DECISION NAS WHITING FIELD FL  
8/23/2004  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

August 23, 2004

4WD-FFB

Commanding Officer  
ATTN Code ES31 **Linda Martin**  
Naval Facilities Engineering Command Southern Division  
P.O. Box 190010  
North Charleston SC 29419-9010

SUBJECT: NAS Whiting Field, Florida  
EPA ID# FL2170023244

Dear Ms. Martin:

The United States Environmental Protection Agency (EPA) has received and reviewed the following documents:

- **Record of Decision for Surface and Subsurface Soils at Site 30, South Field Maintenance Hangar, Naval Air Station Whiting Field, Rev. 1, August 2004** (Tetra Tech NUS, Inc.)
- **Record of Decision for Surface and Subsurface Soils at Site 32, North Field Maintenance Hangar, Naval Air Station Whiting Field, Rev. 1, August 2004** (Tetra Tech NUS, Inc.)
- **Record of Decision for Surface and Subsurface Soils at Site 33, Midfield Maintenance Hangar, Naval Air Station Whiting Field, Rev. 0, July 2004** (Tetra Tech NUS, Inc.)

Enclosed are the EPA's comments based on this review. The comments are divided into general and specific. The general comments apply to all three of the documents, and the specific comments only apply to the referenced document. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

Craig A. Benedikt  
Senior Remedial Project Manager  
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP

**EPA Review Comments  
Sites 30, 32 and 33  
Records of Decision**

**General Comments:**

1. **Section 1.2:** This section of the document should state that the Navy and EPA select the remedy, and that FDEP concurs with the selected remedy. For example, the second sentence should be rewritten as follows: "The selected action was chosen by the Navy and the United States Environmental Protection Agency (USEPA) in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)....". The last sentence of this section should be rewritten as follows: "The Florida Department of Environmental Protection (FDEP) concurs with the selected remedy."
2. **Section 1.3:** This section should identify the nature of the release.
3. **Section 1.5:** Briefly state why the remedy does not satisfy the statutory preference for treatment (i.e. because contaminated soils will remain in place).
4. **Section 1.7:** This section should be renamed as "Authorizing Signatures". In addition, remove the headings "Authorized by:" and "Acceptance by:".
5. **Section 2.2.1:** In the second sentence of the first paragraph, change "...under CERCLA authority." to "...pursuant to CERCLA".
6. **Table 2-1:** The 1986 Verification Study should be listed in this table. Although, the study focused on the investigation of groundwater, the study is part of the site's investigative history.
7. **Section 2.4:** In this section, delete the text in the first paragraph beginning with "In addition to Site .." and ending with the sentence following item number 5. Only the first sentence of the section and the last paragraph should remain.
8. **Figure 2-2:** The legend lists two cleanup goals for soils: CG and SCTL. However, only CG is actually identified on the figure. What is the relationship between the CG and SCTL.
9. **Section 2.7:** Provide more specific remedial action objectives. For example, instead of "protect human health", state "protect the industrial worker". Also include a statement about preventing residential development. RAOs should take into account current and future land uses.
10. **Section 2.8:** Reference Table 2-7 here or identify applicable ARARs.
11. **Section 2.10.1:** Remove "USEPA" from the second sentence in this section since both the Navy and USEPA select the remedy.

12. **Section 2.10.2.2:** In the first sentence, change the word “prevent” to “address”. The LUC objectives should be clearer. Please add the following: (1) Maintain the integrity of any current or future remedial or monitoring system such as monitoring well, impermeable reactive barriers, etc.; and (2) Prohibit the development and use of property for residential housing, elementary and secondary schools, child care facilities and playgrounds.” The engineering controls should also state as one of the objectives “To prohibit digging into or disturbing existing concrete or asphalt cover areas on the site.
13. **Table 2-7:** Correlate ARARs to the remedy to which they apply. Only standards that are promulgated constitute ARARs. Guidance is not an ARAR. While the NCP discusses institutional controls, neither the NCP nor CERCLA contain required standards. Please revise the table to address these comments. Also, the Florida citation should be revised since Florida passed the Risk Based Corrective Action Principles, making  $1 \times 10^{-6}$  the cleanup target level for soils and groundwater for all contaminated sites. See F.A.C. Section 376.30701.

#### **Site 30 Specific Comments:**

1. **Section 1.4, Page 1-1:** In the first sentence, the abbreviation “FSA” should be spelled out since this is the first occurrence in the document.
2. **Section 2.2.3, Page 2-6:** The first full paragraph on this page should explain further how benzo(a)pyrene came to be included as a COC. In the second sentence of the second paragraph, add the word “the” before “UST”.
3. **Section 2.5.1.1, Page 2-8:** In the fourth sentence of the third paragraph, remove the capitalization on the words “Removal Project”.
4. **Section 2.5.1.2, Page 2-10:** In the first sentence of the second paragraph, remove the capitalization on the words “Removal Project”. This comment applies elsewhere in the document where “Removal Project” is capitalized.
5. **Section 2.6.3.1, Page 2-15:** Include the Florida statutory cite imposing the  $1 \times 10^{-6}$  risk.
6. **Section 2.8, Page 2-17:** There appears to be a missing sentence in the first paragraph of this section. After the first sentence, there is a space and then the next sentence begins with “August 2000; therefore, ...”.

#### **Site 32 Specific Comments:**

1. **Section 2.2.2, Page 2-3:** In the first bulleted item (UST Removal), the text should state whether or not the listed constituents were detected in earlier studies.
2. **Section 2.2.2, Page 2-4:** The text should state the listed constituents were added as a result of sampling conducted during the UST removals.
3. **Section 2.5, Page 2-8:** The first sentence of the third paragraph is incomplete. Please revise.

4. **Section 2.5.1, Page 2-8:** The last sentence of the third paragraph is incomplete. Please revise.
5. **Section 2.5.1.2, Page 2-13:** In the second sentence of the sixth paragraph, insert “See Figure 2-2” after 32SB07.
6. **Section 2.6.1.2, Page 2-16:** In the third paragraph, remove the term “standard bootstrap” unless an explanation describing the method is added to the section.
7. **Section 2.7, Page 2-20:** Reduce the indent for Item number 1.

**Site 33 Specific Comments:**

1. **Section 1.4, Page 1-3:** In the first sentence, add the word “the” before the terms “Feasibility Study” and “Feasibility Study Addendum”.
2. **Section 2.2.2, Page 2-3:** Delete the fifth sentence in the second paragraph. This sentence is not relevant to this ROD.
3. **Section 2.10.2.2:** Delete the first sentence of the second paragraph. The last sentence of this paragraph addresses the duration of LUCs.